



## School Auditing Office

### Courses Using Alternative Teacher-Pupil Instruction 8/7/25



# Purpose

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By the end of today's webinar, you should be able to:

- Identify what all alternative instruction courses have in common
- Calculate the instructional time equivalency for an alternative instruction course, and explain why this may be difficult for session-based schools and programs
- Define the 4 types of alternative instruction courses and find the relevant documentation requirements in the Student October Count Audit Resource Guide
- Describe the key differences between alternative instruction courses for brick and mortar students vs. online schools and programs



# Introduction



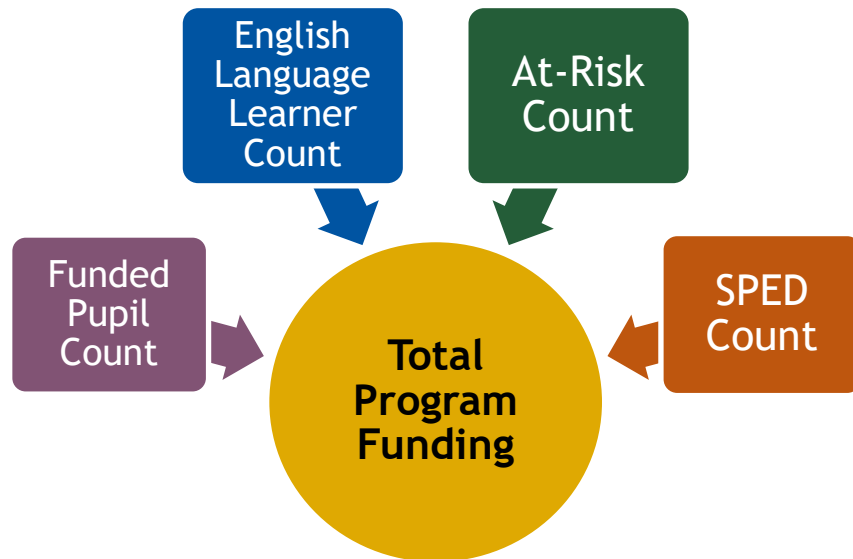
# School Auditing Office

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- Publishes annual Audit Resource Guides
- Conducts [Annual Audit Reviews](#) of all funded counts used in determining Total Program Funding
  - Includes reviewing submitted data, [audit questionnaires](#), prior audits, and student-level documentation
- Provides technical guidance and support to districts related to funding eligibility and documentation requirements
- Info & Contact
  - [School Auditing Office's Website](#)
  - Email: [audit@cde.state.co.us](mailto:audit@cde.state.co.us)

# Total Program Funding

- School districts in Colorado are funded by a variety of sources.
- The biggest source of funding comes from the School Finance Act.
- The amount a district receives according to the School Finance Act is called **Total Program Funding**.
- Counts from the [Student October Count Data Collection](#) are used to calculate Total Program Funding.
- Note: The Special Education Pupil Count is new in 2025-2026 and will not be audited by the School Auditing Office this year.



# Funding and Audit Documentation Requirements

- The School Auditing Office posts annual Audit Resource Guides for each count ([pupil](#), [at-risk](#) and [ELL](#)).
- These Guides describe all funding and audit documentation requirements.
- If flagged for an expanded audit, the district/CSI/BOCES may be required to provide applicable audit documentation to support any student included in one of the funded counts.





# DISCLAIMER

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- All districts, CSI, or BOCES are responsible for the information included in the [2025 Student October Count Audit Resource Guide](#).
  - Originally posted on July 1, 2025
  - An update to the Guide was posted on July 16, 2025
- This webinar focuses on Courses Using Alternative Teacher-Pupil Instruction for brick-and-mortar students only. All other sections of the Guide still apply to the various unique types of students, courses, programs and schools.
- Read the Guide as a whole!

# Student October Count Audit Resource Guide

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# General Funding Requirements



# Funding Requirements:

All funding requirements are based on the pupil enrollment count date (10/1/25).

General funding requirements:

1. Membership
  - a. Enrollment
  - b. Attendance
2. Scheduled Instructional Hours



# Funding Requirements: Attendance

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- Students must be present for all, or any portion of, the pupil enrollment count date (in any scheduled class)
- OR
- If the student is absent for any reason on the count date:
  - Must establish attendance (in any scheduled class) prior to the pupil enrollment count date during the current school year AND
  - Must resume attendance (in any scheduled class) within 30 days following the pupil enrollment count date
    - This assumes the student does not break their enrollment with the district

**Note:** Attendance documentation for alternative instruction courses may be different than other courses.

# Funding Requirements: Scheduled Instructional Hours

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- For most student/course types, funding level eligibility is based on scheduled instructional time (direct or alternative) during Fall semester:
  - Part-time funding: 90, but less than 360, hours
  - Full-time funding: 360+ hours
- Districts and schools must provide individual student schedules for all secondary (grades 6-12) students.
  - Should reflect what was true as of the pupil enrollment count date
  - Should encompass the entire Fall semester
- Additional considerations apply to:
  - Postsecondary courses
  - Alternative Instruction courses for brick-and-mortar students
  - Students enrolled in Colorado Public Online Schools & Programs

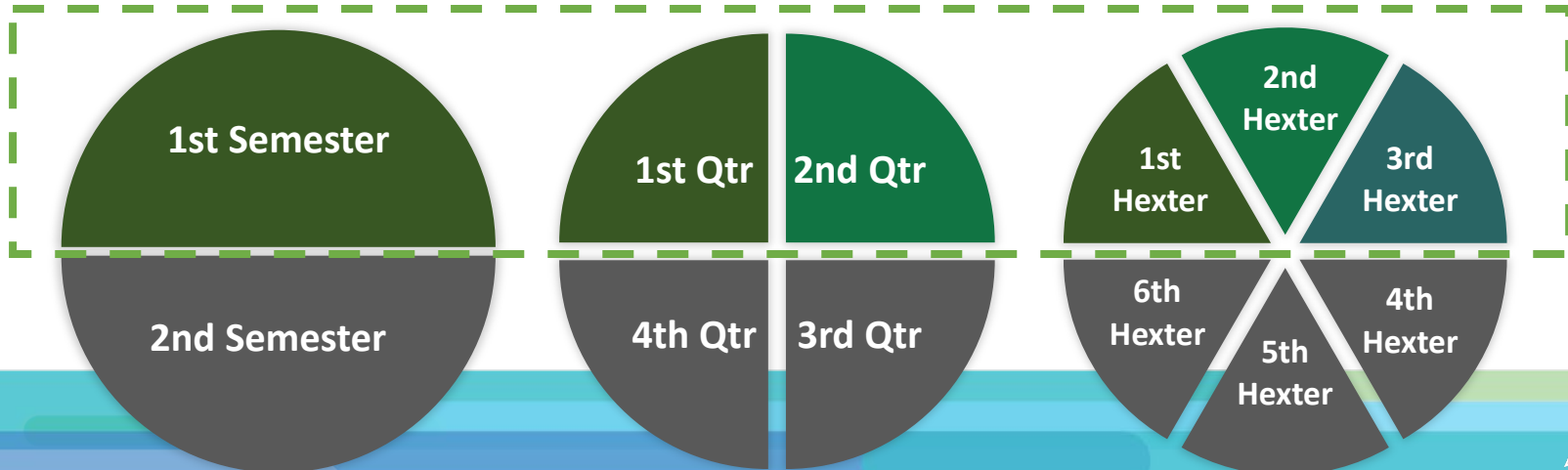
# Student Schedule Considerations

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- Student schedules must clearly show all courses, instructional sessions, and/or special education services into which the student is scheduled during the entire Fall semester.
  - Schedules should reflect what is true as of the pupil enrollment count date (10/1/25).
  - Students should be aware of the courses, or the days and times into which they are scheduled, during the entire semester of the pupil enrollment count date.
  - Schedules must be detailed enough that the scheduled days and times can be aligned to the attendance.
- Each student's schedule should be developed to meet the student's individual needs.
- Red flags that may require further investigation include:
  - A generic placeholder schedule for all students
  - Attendance documentation that does not align with the provided schedule
  - Etc.

# “The Semester of the Pupil Enrollment Count Date”

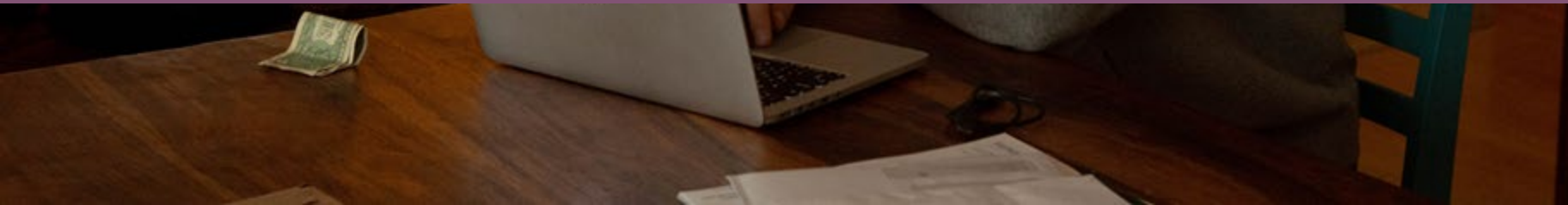
- Funding level is based on the student’s **entire** fall semester schedule (i.e., semester 1, quarters 1 & 2, or hexters 1, 2, & 3, etc.)
- Fall semester is half the scheduled student contact days according to the school calendar, regardless of how the school organizes terms.







## Courses Using Alternative Instruction



# 2024 Update to School Finance Rules

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- In March 2024, the State Board of Education approved changes to [the Rules for the Administration of the Public School Finance Act](#) (1 CCR 301-39).
- These rules apply to all schools and programs.
  - Exception: Section 2.05 does not apply to online schools and programs, which are governed by 22-30.7-105(2)(a) and 1 CCR 301-71, Rule 8.
- The key school finance rule update we will discuss today is the distinction between direct teacher-pupil instruction and alternative teacher-pupil instruction.

# Brick-and-Mortar Instruction Types in the Updated Rules

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# Direct Instruction

## “Direct teacher-pupil instruction”

[T]he organized delivery of educational content (aligned to state standards where applicable) for pupils enrolled in brick-and-mortar public schools under the supervision of a licensed educator that **takes place synchronously**, when the licensed educator and the pupil are in the **same physical location** or when the licensed educator and the pupil are in the **same virtual classroom**.

Direct instruction also includes engagement with educational content in courses, such as **study hall or advisory or credit recovery lab or independent study**, that are on-site at a **scheduled time during regular school hours and for a set amount of time and where attendance is mandatory**.

**Synchronous** means students & teachers engage:

- At the same time
- In the same physical or virtual classroom

**Direct instruction** includes non-credit-bearing periods or sessions that are:

- At a scheduled time
- During regular school hours
- For a set amount of time
- With mandatory attendance

# Alternative Instruction

**Asynchronous** means students and teachers engage in material:

- At different times, and/or
- Not in the same physical or virtual classroom

**Alternative instruction** is asynchronous.

(“Alternative Instruction” has nothing to do with an “Alternative Education Campus.”)

## “Alternative teacher-pupil instruction”

[T]he organized delivery of educational content (aligned to state standards where applicable) for pupils enrolled in a brick-and-mortar public school under the supervision of a licensed educator that **may take place asynchronously**.

# What do Alternative Instruction Courses have in common?

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- For **brick-and-mortar** students only.
- Each alternative instruction course is **credit-bearing**.
- **Instructional time** used to calculate a student's funding level is based on an **equivalency** for each alternative instruction course.
- The course must appear in a **catalog of courses** using alternative instruction, published to the school, district, or BOCES website.
- Alternative instruction courses are only available to students in **grades 6-12**, and students receiving home-bound/expelled services (in any grade).



# Which Type of Instruction Do You Use Now?

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- Are students scheduled to come in-person or in live “virtual classrooms,” at a set day and time?
  - This is direct instruction and is still evaluated based on the scheduled “seat time” hours for the semester.
  - The School Auditing Office does not evaluate the number of courses or the amount of credit earned by students in regular direct instruction periods.
- Do students have flexibility to work asynchronously at least part of the time - e.g., from home, or in person without a set time?
  - To count asynchronous time for funding, the student must be scheduled into individual alternative instruction **courses**.
  - For funding purposes, instructional time equivalency is evaluated at the course level, not the “program” level.
- Even if students are working on the same material, the State Board Rules make it clear that the schedules must be evaluated based on the type of instruction!

# Courses Using Alternative Teacher-Pupil Instruction In the Updated Rules

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The 4 types of alternative instruction courses are:

- Blended Learning Courses
- Independent Study Courses
- Supplemental Online Courses
- Work-Based Learning Experience Courses

Alternative instruction can only be included in the “fall semester schedule” time as part of one of these courses!



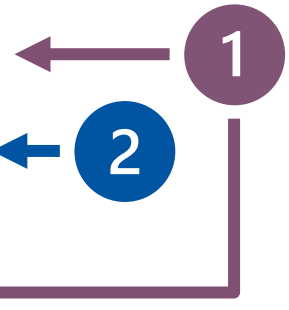


## Equivalent Hours Considerations for Alternative Instruction Courses



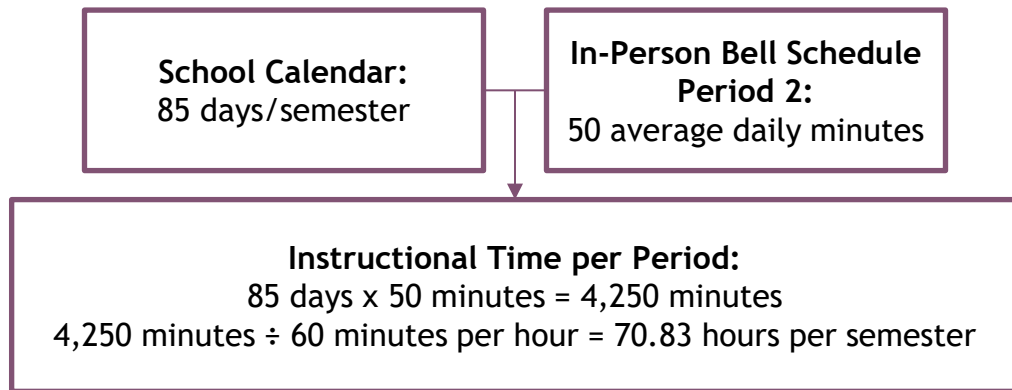
# Instructional Time Equivalency for Alternative Instruction Courses

- All alternative teacher-pupil instruction is evaluated **at the course level**.
  - Alternative instructional time cannot be associated with a “session” or “program” - it must be associated with a specific course.
- The instructional time that may be included in calculating a student’s funding level is based on **the amount of instructional time** a student would receive:
  - if taking the **same or similar credit-bearing course** (i.e., offering the same number of credits)
  - in a 100% direct instruction course
  - offered **at the school where the student is reported.**



# The First Equivalency Requirement

- Does the **school** where the student is reported have a traditional bell schedule where students spend a defined amount of time on each direct instruction class in Fall semester?
- Ex: In-person Algebra takes place in Period 2.



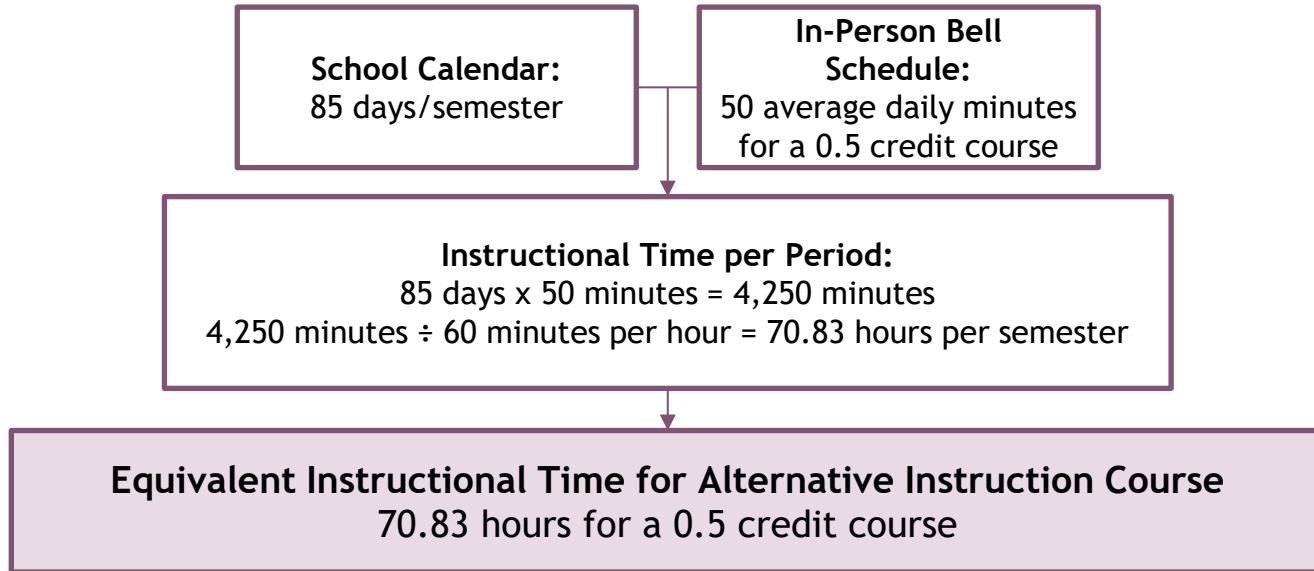
# The Second Equivalency Requirement

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- Does the **school** where the student is reported offer a set amount of credit per completed course?
  - Ex: **In-person Algebra in Fall semester is worth 0.5 credit on a student's transcript.**
- Credit-bearing means that “a **passing grade** and **credits** are given for **satisfactory completion** of course requirements within the parameters of the **academic calendar.**”
  - This is true for all students, even if they are not in a credit-seeking program (ex: HSED, Transition, “competency-based,” homebound elementary students, etc.).



# Simplified Example of Instructional Time Equivalency Calculation



For full details, review Appendix A of the Student October Count Audit Resource Guide.

# Non-Traditional Students & Alternative Instruction Courses

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- Alternative instruction courses are a flexibility in calculating scheduled hours for funding purposes that districts may or may not choose to use.
- The State Board laid out specific requirements that must be met in order to include these courses in the determination for funding.
- Non-traditional schools and programs may have challenges in meeting these requirements.
- Reach out to the School Auditing Office by **9/15/25** if your district has a non-traditional school or program exploring any of the 4 alternative instruction course types for the 25/26 year.

# Non-Traditional School Equivalencies

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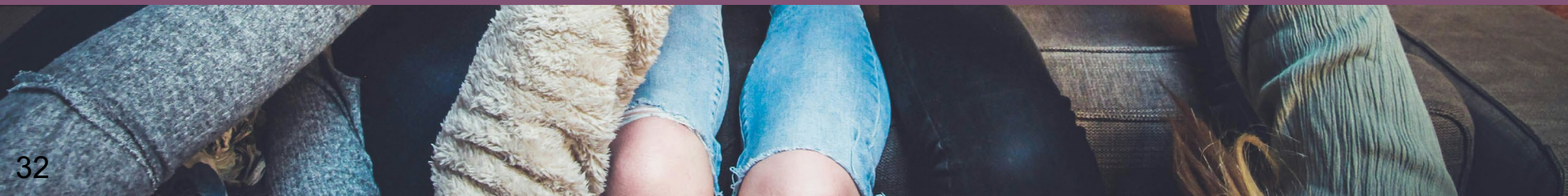
If alternative instruction courses are offered at a **school** that does NOT meet both criteria, you **MUST** reach out to the School Auditing Office prior to **September 15, 2025** to have an equivalency assigned for 25/26!

If you do not, CDE will determine an equivalency at the time of audit, which may result in audit adjustments.

([audit@cde.state.co.us](mailto:audit@cde.state.co.us))



# The 4 Types of Alternative Instruction Courses



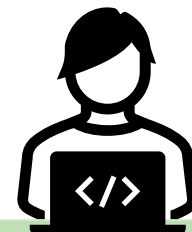
# Supplemental Online Courses

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- Credit-bearing courses taken by students enrolled in traditional, brick-and-mortar schools
- in which all of the instruction is digitally delivered and
  - is received off-site or
  - is taken on-site but not at a scheduled time where attendance is mandatory.

## Notes:

- Brick-and-mortar students can “supplement” their schedule with online courses.
- If students are required to be present on-site to work on a specific class during a scheduled time where attendance is taken, the class is NOT considered supplemental online!
- More on Supplemental Online Courses later in the presentation.

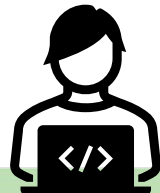
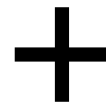


# Blended Learning Courses

- Credit-bearing courses for a student enrolled in a traditional brick-and-mortar school
  - where some of the direct instruction is regularly received in-person and on-site and
  - some of the digitally-delivered asynchronous instruction is received off-site
    - (with some element of student control over the time and place of participation).

## Notes:

- In-person instruction must be specific to each blended learning course - e.g., Blended Algebra meets Tuesdays from 9-9:45am.
- “Work Sessions” where students are required to come in person but work on any course they want do not meet the definition of blended learning!

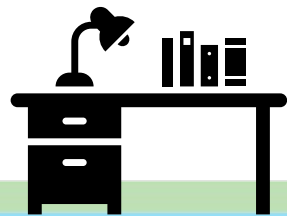




# Independent Study Courses

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- Credit-bearing courses
- in which **some** or **all** of the course is being completed **off-site, independently** by the student.
- They include the provision of content aligned to grade-level standards (where applicable)
  - and are substantially equivalent to a traditional course.
- For funding, this course must have a **written learning plan** that includes:
  - the course outline or plan of study,
  - the digital or print curriculum or materials to be used,
  - requirements for submitting assignments and recording the academic progress, and
  - the role of the supervising licensed teacher.
- **No more than 1 independent study course can be used in the determination for funding.**



# Work-Based Learning Courses

- Credit-bearing courses
- that must be incorporated within the student's **Individual Career and Academic Plan (ICAP)** in order to qualify for funding.
- They are learning opportunities that occur **in part or in whole in the workplace** and
- provide the learner with hands-on, real-world experience.

## Notes:

- Schedule documentation for WBL courses must indicate the amount of credit the student is attempting in Fall semester.
  - Different course codes or course titles defined in the course catalog may help with this
- It doesn't matter how many hours a student is required to **work** - for funding purposes, equivalent instructional time is based on the **credit** the student will earn.



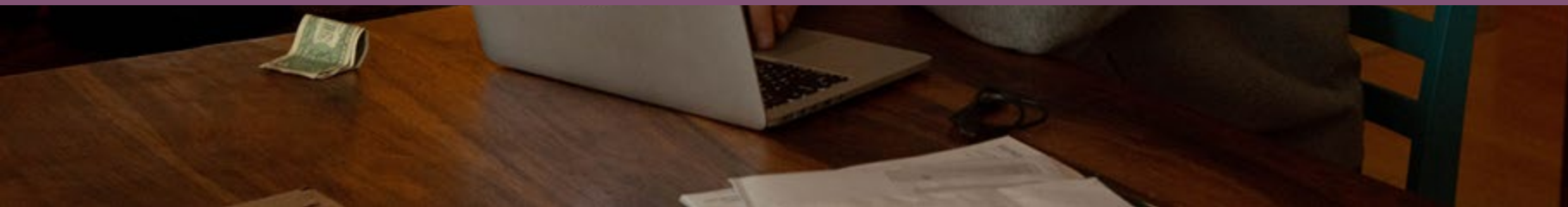
# ICAP for Work-Based Learning Courses

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- [1 CCR 301-81, Rules Governing Standards for Individual Career and Academic Plans \(ICAP\)](#), was updated in January 2025.
- All students enrolled in public schools in Colorado are required to have an ICAP.
- To be included in a student's schedule for funding purposes, any work-based learning course must be documented within the student's ICAP portfolio. Required information includes:
  1. Student name
  2. The term for which it applies (e.g., Fall 2025)
  3. The date the document was created or updated (before count day!)
  4. The specific work-based opportunity that the student is pursuing
  5. A description of how the work-based learning course connect to the student's postsecondary workforce or education goals.
- The documentation should clearly indicate that it is part of the student's ICAP portfolio.



## Online Schools & Programs



# Online Schools & Programs: Definitions

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- An “Online School or Program” is:
  - a Colorado online public school, or online program
  - authorized by a Colorado school district or BOCES that has submitted Authorizers Assurances to the CDE Office of Blended and Online Learning and
  - that meets the statutory definition of an online school or program.
- An “Online School or Program” does **not** refer to vendors of particular software, curriculum, or “online courses” (such as CDLS, Edgenuity, Edmentum, Gradpoint, K12, etc.) nor online schools or programs operating out of the state of Colorado (such as Florida Virtual Academy).
  - CDE does not review/approve these vendors; districts are responsible for choosing appropriate materials for their students.

# Online Courses Offered to Brick-And Mortar Students

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- Many schools and districts in the state use a Colorado Public Online School or Program to provide supplemental online courses (or the digital portion of blended learning courses) to brick-and-mortar students.
- Online Program: Pupils only enrolled in online K-12 courses that take place off-site, but are not enrolled in an online school, must be enrolled in a Colorado public online program (unless they are homebound/expelled).
  - A student is not exclusively enrolled in online K-12 courses if they have at least one course scheduled to take place on-site, in-person, at a regularly scheduled time during regular school hours and where attendance is mandatory.

# Reporting How Students are Taking Online Courses

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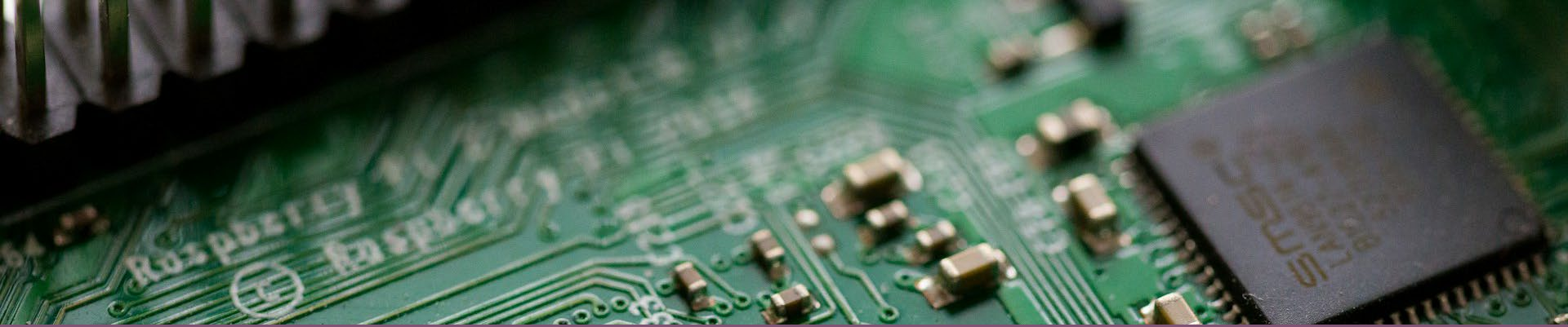
- Use funding codes 91/94 to identify students who are enrolled in a single-district online school or program, vs. 80/82/85 for students enrolled in a brick-and-mortar school.
  - SDOL students are funded at the same rate as brick-and-mortar students.
- MDOL students use funding codes 92/95 and are funded at a different rate.



# Resource for Online Schools and Programs

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- Online Schools and Programs section of the Student October Audit Resource Guide.
- The 2025 training for Online Schools and Programs was recorded 7/24/25 and is available on the School Auditing Office Training page.
- The [Multi-District and Single District Online Schools & Programs List](#) webpage has the complete list of certified MDOL schools and SDOL schools and programs that have provided notification to the Office of Blended and Online Learning.



Brick-and-Mortar  
Alternative Instruction Courses  
vs.

Online Courses offered to Students Attending  
Colorado Public Online Schools and Programs



# Brick-and-Mortar Schools Offering Supplemental Online Courses from Online Schools and Programs

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- If a Colorado public online school or program is providing supplemental online or blended learning courses to students **primarily** enrolled in brick-and-mortar schools, these courses are ‘alternative instruction courses’ for the brick-and-mortar student.
- This can be tricky because both groups of students may be engaged in the same course content.
- Equivalent instructional time for the brick-and-mortar student is determined by **a similar credit-bearing course at their brick-and-mortar school**, as discussed above.
  - Their equivalency is not based on the equivalency statement determined by the Colorado public online school or program!

# Instructional Time Equivalency (continued)

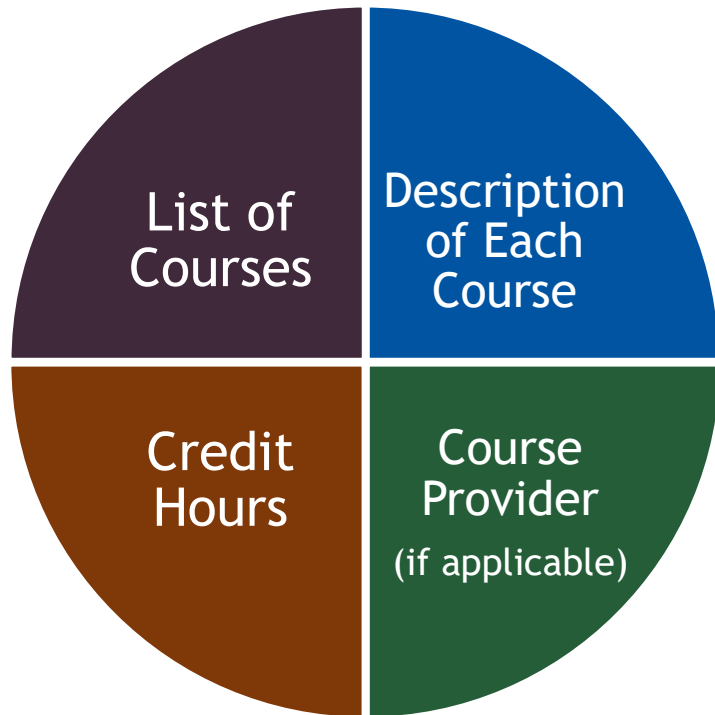
Brick-and-Mortar Students	Online School or Program Students
<p>Alternative Course Equivalency is:</p> <ul style="list-style-type: none"><li>• the actual semester hours of direct instruction</li><li>• for the same or similar course</li><li>• that earns the same amount of credit</li><li>• at the school where the student is reported</li></ul>	<p>Online Course Equivalency is:</p> <ul style="list-style-type: none"><li>• reasonably aligned with the actual semester hours of instruction (within 10%)</li><li>• for the same or similar course</li><li>• that earns the same amount of credit</li><li>• at a school in the authorizing district or BOCES</li></ul>

# Compare and Contrast

Brick and Mortar Students	Online Students
<ul style="list-style-type: none"><li>Any of the 4 types of alternative instruction courses are allowed.</li></ul>	<ul style="list-style-type: none"><li>Alternative instruction course designation does not apply to online students.</li><li>All courses offered to online students by the SDOL/MDOL schools or programs are evaluated the same.</li></ul>
<ul style="list-style-type: none"><li>Proof of residency is required <b>only</b> for students who are not scheduled into courses that require them to be on site in person at specific days and times.</li></ul>	<ul style="list-style-type: none"><li>Proof of residency is required for <b>all</b> online students.</li></ul>
<ul style="list-style-type: none"><li>A student reported at a brick-and-mortar school may take blended learning courses and supplemental online courses offered by an MDOL or SDOL school or program.</li><li><b>Brick-and-mortar</b> students cannot be exclusively enrolled in online courses.</li></ul>	<ul style="list-style-type: none"><li>A student enrolled in an online school or program may supplement their schedule with courses at a brick-and-mortar school.</li></ul>

# Alternative Teacher-Pupil Instruction Course Catalog

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- To include courses using alternative teacher-pupil instruction in the determination for funding, the district (or school) must have a course catalog that includes the 4 requirements.
- This catalog must be posted on the school/district/BOCES website by the applicable count date.
- The course provider is the vendor from whom the district purchases the course content

# Alternative Instruction Catalog Course Provider

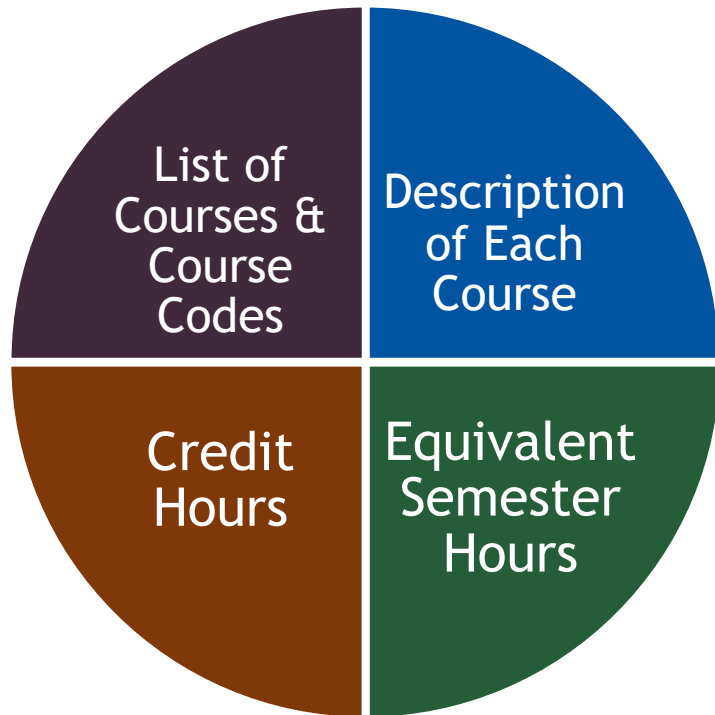
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- “Course provider” refers to the **entity that creates the digital course content**.
- If the district purchases digital course content from a third-party vendor (such as CDLS, Edgenuity, Edmentum, Gradpoint, etc.), the vendor is the course provider.
- If the district uses digital course content created “in-house” by district or school staff for these course types, the course provider is the district or school.



# Online School or Program Course Information

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- As described in the Guide since 2020/2021, to include online courses the determination for funding, an online school or program must document these 4 requirements.
- If a single document does not contain all the required course information, a combination is fine.
- An alternative instruction course catalog may link to the online course catalog of their course provider.
  - If so, double-check that the alternative instruction course catalog includes all 4 required pieces of information!



## Other Considerations

# Attendance for Alternative Instruction Courses

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- Attendance verification for alternative instruction courses is limited to:
  - Evidence of attendance in direct instruction content
  - Logins into course content for digitally-delivered instruction
  - For work-based learning courses, documentation from an employer (e.g., timesheets, paystubs) that lists a student's name and dates worked
- For Independent Study courses, districts may submit a “Request for Alternative Attendance Documentation” to the School Auditing Office by September 15.

# Brick-and-Mortar Schools Offering Supplemental Online Courses from Online Schools and Programs

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If a district is using an MDOL or SDOL (school or program) to provide supplemental online courses to its brick-and-mortar students:

- For funding purposes, **logins into course content** are the only way a brick-and-mortar student can evidence attendance for supplemental online courses.
- Documentation outlined in the MDOL or SDOL school's or program's authorizer assurance do not apply to brick-and-mortar students taking alternative instruction courses.

# New Student October Count Snapshot Data

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- Beginning in 2024/2025, there are four new data fields in the Student Interchange- Student School Association file:
  - Independent Study Course
  - Work-Based Learning Opportunity Course
  - Blended Learning Course
  - Supplemental Online Course
- For each of these fields, districts indicate whether a given student is scheduled into any of these alternative instruction courses during the Fall semester.
- For students enrolled in SDOL or MDOL schools, or identified as being in an SDOL program, all of these fields should be flagged “no” (i.e., value of ‘0’).
- Alternative instruction course types do NOT apply to Colorado public online schools and programs!

# Coding Patterns within Student October

	Brick-and-Mortar Students in Alternative Instruction Courses	SDOL <u>Program</u> Students	SDOL <u>School</u> Students	MDOL School Students
Funding Code	80, 82, 85	91, 94	91, 94	92, 95
Non-School Program Code	<> 01	01	<> 01	<> 01
Blended Learning Course Code	'0' - No <u>or</u> '1' - Yes	'0' - No	'0' - No	'0' - No
Supplemental Online Course Code	'0' - No <u>or</u> '1' - Yes	'0' - No	'0' - No	'0' - No
Work-based learning course code	'0' - No <u>or</u> '1' - Yes	'0' - No	'0' - No	'0' - No
Independent Study course code	'0' - No <u>or</u> '1' - Yes	'0' - No	'0' - No	'0' - No

# Proof of Colorado Residency For Brick-and-Mortar Students

The district must verify and document student residency in the State of Colorado upon enrollment and annually thereafter for any pupil:

- Exclusively enrolled in alternative teacher-pupil instruction **or**
- That has a schedule that does not require the pupil's regular physical presence at the public school.

A sample [Brick-and-Mortar Affidavit of Colorado Residency Sample](#) is available as a PDF document on the [Pupil Count page](#).

***Affidavit of State of Colorado Residency***  
Pursuant to 1 CCR 301-39, rule 5.08, for brick-and-mortar pupils exclusively enrolled in alternative teacher-pupil instruction or any pupil that has a schedule that does not require the pupil's regular physical presence at the public school, the district must verify and document student residency in the State of Colorado upon enrollment and annually thereafter.

Please complete all of the following required fields in order to evidence Colorado residency for the student listed below for purposes of residency status for the Colorado Department of Education. Failure to complete all fields will result in an invalid/incomplete Affidavit.

**Affidavit Completer Information**

*Name of Person Completing this Affidavit*

*Relationship to student listed below:*  
☐ Parent  
☐ Legal Guardian  
☐ Self (student 18 years or older)  
☐ Self (student without a parent/guardian AND is in a crisis housing situation as defined by the McKinney-Vento Act)

**Student Information**

*Name of School or Program*

*Student Name*

*Student Grade*

**Physical Address Information (cannot be a PO Box)**

*(Street address)* *(Apt. or Unit)*

*(City)* *(County)* *(ZIP code)*

**Affirmation and Signature**

*I do hereby declare, under penalty of perjury under Colorado law, that the student listed above is currently a resident of the State of Colorado and that the foregoing is true and correct.*

*Signature* *Date*

Note: This form must be signed and dated within 365 days prior to the district or school's count date in order to be considered valid for funding purposes.





## Recap: Key Points



# Recap: Student Schedules using Alternative Teacher-Pupil Instruction

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- Alternative instruction only counts towards funding determination if the **course** meets the definition of a blended learning, supplemental online, work-based learning or independent study **course**.
  - Alternative instructional time cannot be associated with a “session” or “program”, it must be associated with a specific course.
- An equivalent amount of instructional time will be applied to each **course** using alternative instruction, based on the in-person bell schedule at the **school** where the student is reported in Student October.
- If the student does not meet the attendance requirements in direct instruction courses, the district must have appropriate specific attendance documentation for alternative instruction courses.
- When in doubt, review the Student October Count Audit Resource Guide!





## Resources



# Audit Count Websites and Audit Resource Guides

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- Funded Pupil Count
  - [Pupil Count](#) website
  - [2025 Student October Count Audit Resource Guide](#)
- At-Risk Count
  - [At-Risk Count](#) website
  - [2025 At-Risk Count Audit Resource Guide](#)
- English Language Learner (ELL) Count
  - [English Language Learner Count](#) website
  - [2025 English Language Learner Audit Resource Guide](#)

# Annual Audit Review Questionnaires

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The [Annual Audit Review Process](#)  
questionnaires and associated document uploads are due  
**September 15, 2025!**

- The 2025 questionnaires cover similar topics to last year.
- The questions and format have been streamlined and reorganized based on last year's results and feedback from the field.
- The Pupil Count Questionnaire includes questions about alternative instruction courses.
- The pupil count and at-risk questionnaires each have an associated training - see the [Training website](#) for details.

# Contact

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## School Auditing Office

- Email: [audit@cde.state.co.us](mailto:audit@cde.state.co.us)
- [School Auditing Office Overview Website](#)
  - [Training and Office Hours Website](#)

## Rebecca McRee, Audit Manager

- Email: [mcree\\_r@cde.state.co.us](mailto:mcree_r@cde.state.co.us)